

of Illinois and is an employer engaged in an industry affecting commerce, within the meaning of 29 U.S.C. §185.

4. This Court has jurisdiction of this action, pursuant to Section 301 of 29 U.S.C. §185, as a suit for violation of a collective bargaining agreement between an employer and a labor organization representing employees in an industry affecting commerce. This Court also has jurisdiction of this action, pursuant to the United States Arbitration Act, 9 U.S.C.S. §9, as a suit for confirmation of an arbitration award.

5. Venue is proper in the Northern District of Illinois, Eastern Division, pursuant to 29 U.S.C. §185, because this is where the cause of action arose, where the Defendant has performed work, and where representatives of the Union are engaged in representing or acting for their members. Venue is also proper in the Northern District of Illinois, Eastern Division, pursuant to 9 U.S.C.S. §9, as the arbitration award was made in this District.

6. Defendants entered into an Agreement whereby it agreed to be bound by the provisions of a Collective Bargaining Agreement ("CBA") that requires Defendants to post a \$50,000.00 wage and fringe benefit bond.

7. The Agreement, through the CBA, also binds the defendant to the grievance procedure and to final and binding arbitration.

8. A hearing was held pursuant to the CBA, and on April 9, 2009 an award was entered in favor of Local 1 and against Defendants in the amount of \$55,000.00. (Exhibit B)

9. Demand was made upon Defendants for payment, and no part of said indebtedness has been paid.

WHEREFORE, for the foregoing reasons, Plaintiff prays that this

Honorable Court:

- A. Enter Judgment against LONNIE DANTZLER, KEVIN DANTZLER, and D & B CONSTRUCTION jointly and severally in the amount of \$55,000.00, plus attorney fees and court costs.
- B. Grant plaintiff such other and further relief as the Court deems just and equitable.

BRIDGE, STRUCTURAL AND REINFORCING
IRON WORKERS LOCAL # 1,

By: s/Raymond J. Sanguinetti
Raymond J. Sanguinetti

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